

WOKING SITE ALLOCATIONS DPD – EXAMINATION HEARING STATEMENT

MATTER 3

WEST HALL, PARVIS ROAD, WEST BYFLEET

ON BEHALF OF ANCHOR HANOVER GROUP (AHG)

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1. INTRODUCTION

- 1.1 This Hearing Statement is submitted on behalf of Anchor Hanover Group in response to the Inspector’s Matters and Questions which were published on 14th October 2019 in advance of the forthcoming hearing sessions for the Woking Borough Council Site Allocations DPD examination. Pegasus Group request to be present at the hearing sessions scheduled for the 4th, 5th and 6th December 2019.
- 1.2 Anchor Hanover Group currently operate a Care Home at West Hall which is located in the open countryside between West Byfleet and Byfleet. The exact location is shown below.

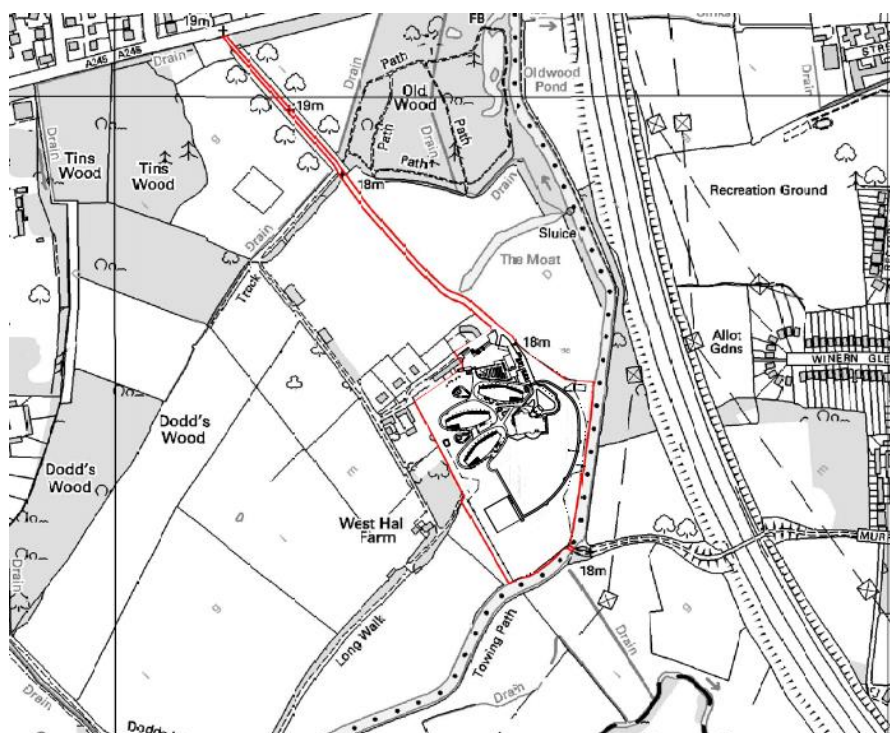


FIGURE 1 – SITE LOCATION PLAN EXTRACT

- 1.3 The Care Home facilities at this site are dedicated to residents with Alzheimers and other forms of Dementia and significant investment in recent years has led it to being considered among the best care facilities for Dementia Care in the Country. The quality of the care home is reflected in the fact that was rated 'Outstanding' for service by the Care Quality Commission in October 2016, scored 907/1,000 in the 2017/18 Residents Survey and won the Best Interior Dementia Design category at the National Dementia Care Awards.

1.4 The Care Home abuts the proposed allocation **GB10: Land Surrounding West Hall**. Whilst our client supports the principle of development at this site, they are keen to ensure that its need has been robustly justified and that it would not adversely affect the quality of care it delivers to its highly vulnerable patients.

1.5 This hearing statement specifically relates to Matter 3 and the following Issues/Questions:

- Issue i)
 - Question 1;
 - Question 2;
 - Question 3;
 - Question 4;
- Issue iii)
 - Question 1;
 - Question 2;
 - Question 4;
 - Question 5.
- Issue iv)
 - Question 1.

2. ISSUE i) QUESTION 1

Does the Green Belt Review's focus on land 'parcels' provide a sufficiently fine-grained assessment of the GB?

- 2.1 The methodology for identifying potential sites for release from the Green Belt is set out in 1.3 of the Green Belt Review ([WBC/SA/E018](#)). The approach to identifying sites followed a sequential approach which started with assessing larger parcels to eliminate unsuitable land before undertaking a more detailed 'finer grain' approach to assessing the remaining sites.
- 2.2 We are broadly satisfied with this approach to assessing the suitability of Green Belt release.

3. ISSUE i) QUESTION 2

Does the methodology of the Green Belt Review place appropriate emphasis on the permanence and purposes of the GB?

- 3.1 Paragraph 1.3.11 of the Green Belt Review acknowledges the requirement to ensure that an enduring and robust new boundary is identified to endure beyond the plan period to 2040.
- 3.2 Bullet 3 of paragraph 1.3.12 also states that part of the approach was to consider the integrity of the Green Belt as a whole when identifying preferable development locations.
- 3.3 The need to ensure that boundaries were redrawn in an appropriate manner was built into Stage 5 of the process which brought together the preceding stages to rationalise the boundary.
- 3.4 We are, therefore, satisfied that the Green Belt Review placed an appropriate emphasis on the permanence of the Green Belt.
- 3.5 With regard to the purposes, we are similarly generally satisfied that this has been appropriately emphasised, albeit we have some reservations with regard to the Council's approach to purpose No.4 (preserving the setting and special character of historic towns).¹

¹ See response to Issue i) Question 4.

4. ISSUE i) QUESTION 3

Does the Green Belt Review pay appropriate regard to the GB's purpose of preserving the setting and special character of historic towns?

- 4.1 The Green Belt Review acknowledges that one of the main purposes of the Green Belt is to preserve the setting and special character of historic towns. However, it did not consider Woking to constitute a historic town with a strong relationship with its wider landscape.
- 4.2 Nevertheless, we understand that landscape sensitivity was considered as part of the assessment of the identified parcels, suggesting that there is at least some functional relationship between the surrounding area and the settlement.
- 4.3 We also note that there is no clear definition of a historic town within the NPPF or PPG. It is not, therefore, clear whether Woking should be considered to be a historic town or not. We note that parts of Wokingham are affected by conservation areas and can be traced back to the Domesday Book. The Green Belt must, therefore, presumably play some role in preserving the setting of some of these historic areas.
- 4.4 It is possible that the Green Belt Review has erred in its decision to ignore this matter completely as part of its assessment.

5. ISSUE i) QUESTION 4

Does the Green Belt Review's objective of identifying suitable, deliverable sites for 550 homes over the plan period provide an appropriate basis for assessment?

- 5.1 In our response to Matter 2, we set out why we consider that the Council has not adequately identified the needs of older people and, as a consequence, why they have also failed to prepare a strategy to address this need.
- 5.2 It is our view that the Council will need to revisit this and consider how this need will be met. The current strategy only allows for a fraction of this requirement and does not address it specifically within the policies of the proposed development allocations.
- 5.3 Until the Council sets out a robust and clearly defined strategy to meet the needs of older residents, we cannot be confident that the objective of identifying suitable, deliverable sites for 550 homes is an appropriate basis for the assessment.

6. ISSUE iii) QUESTION 1

Are the policy requirements related to the GB allocations informed by evidence of affordable housing need, infrastructure requirements, the inclusion of local and national standards and a proportionate assessment of viability?

- 6.1 Given that our client's interest relates solely to Policy GB10, we are only commenting on this policy.
- 6.2 We are broadly satisfied that the policy requirements in respect of affordable housing need, infrastructure requirements, the inclusion of local and national standards and a proportionate assessment of viability are informed by a sound evidence base.
- 6.3 However, as stated previously, the need to deliver housing to meet the needs for older people is not reflected in the wording of this, or any other, allocation. The Council needs to review the evidence base, note the need for specialist accommodation to meet the needs of older people and identify which allocations would be best placed to deliver this need or allocate additional sites if necessary.
- 6.4 We consider that the GB10 allocation would be suitable to deliver Class C2 accommodation as part of its development and, as such, would welcome the policy being updated to identify this as an appropriate use that could come forward on this site specifically.
- 6.5 Furthermore, we would also expect the policy wording to cite the need to maintain an appropriate relationship with existing, nearby uses, such as our client's site. As stated in the introduction, the residents of the care home benefit from being within a tranquil setting and it is important that this is preserved so that the high standards of care can be maintained.
- 6.6 As such, it will be important for appropriate buffers to be provided to ensure this amenity is preserved. Given the Green Infrastructure requirements set out within the policy, we expect that this will be achievable. However, our client would be more comfortable if the need to protect the amenity of existing uses was built into the policy. This could be achieved through a requirement to engage with our client in respect of a master planning exercise for the site.

7. ISSUE iii) QUESTION 2

To what extent would housing allocations in the GB anticipated to come forward in the next 5 years be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years?

- 7.1 The draft Policy indicates a number of constraints that could prevent the site from coming forward for development in the 5-7 years following the plan's adoption. We would expect the Council to provide robust evidence at the examination hearing sessions to confirm that the site is indeed deliverable over the remainder of the plan period.
- 7.2 Our response to Issue iii) Question 4 sets out our reservations that the site is deliverable within these timescales.

8. ISSUE iii) QUESTION 4

Policy GB10 of the SADPD relates to a site that is within a Mineral Safeguarding Area. The reasoned justification to Policy GB10 indicates that borehole testing of the site would be necessary, which may then lead to the full investigation of whether any reserves could be worked prior to any development that could sterilise those reserves. How have the implications of this informed the phasing and delivery assumptions of GB10?

- 8.1 The wording of the policy in respect of the site's release is unconventional at present in that it suggests that its release for development will take place 'at some point' between 2022 and 2027. The policy indicates that the timing will be down to whether there has been significant under-provision against the Core Strategy housing requirement.
- 8.2 Indeed, the policy wording implies there is a possibility that the site may not come forward at all, especially if the delivery of housing meets the Core Strategy requirement.
- 8.3 This is a peculiar approach to take for a number of reasons:
1. The Council, presumably, have already asserted that the Exceptional Circumstances required to justify Green Belt releases to meet the housing requirement has been demonstrated. The Council have, therefore, concluded that the site needs to come forward to meet their housing needs;
 2. Why one would hold back a site that is supposedly needed to deliver housing 'at some point' until a shortfall has been identified is strange given that the need for it has already been demonstrated and its prompt release would help avoid this situation in the first place;
 3. The need for borehole testing at the site means that scope for delays to the delivery of the site would need to be factored into the trajectory and means that its ability to address a shortfall in the short-term may be limited; and
 4. Amendments to the Green Belt should be established upon adoption of the development plan that makes these amendments.

- 8.4 As far as we are aware, there is no detailed delivery trajectory for the site. However, if it is to be delivered by 2027 then it will need to have obtained detailed planning consent by 2022/3 to be reasonably confident of being built out by this date.
- 8.5 The site will, therefore, need to be released for development upon adoption of the Plan in order to allow for sufficient time to undertake any testing works and deliver on its obligations by 2027.

9. ISSUE iii) QUESTION 5

How has the 14.8ha figure for residential development on the GB10 site been arrived at, and does the figure include the proposed traveller pitch provision?

- 9.1 It is not explicitly clear how the 14.8ha figure for residential development has been identified. We would expect the Council to explain this at the examination hearing sessions.

10. ISSUE iv) QUESTION 1

Has the allocation of sites for Traveller accommodation and transit pitch provision followed the sequential approach set out within Policy CS14 of the Core Strategy?

- 10.1 The Traveller Accommodation Assessment (TAA) identifies the need for 19 additional pitches to be provided between 2021-2027. Whilst we note that the findings of the TAA may need to be updated in light of the Government's Planning Policy for Traveller Sites (PPTS), we accept that traveller sites will be needed on sites beyond the existing built up area. This means that Green Belt sites will need to be identified specifically to accommodate this need.
- 10.2 However, it is not clear why GB10 has been identified to accommodate the bulk of these new pitches (15) alongside GB2 (6). It is not clear why a more dispersed approach has not been opted for when other allocated sites would be well placed to accommodate some of this need. We would expect the Council to explain this thoroughly at the examination.
- 10.3 Furthermore, once the general location has been decided upon, careful consideration will need to be given to the position of these pitches and how they could affect surrounding uses. Our client's site abuts the GB10 allocation which is proposed to deliver 15 pitches. Given the sensitivities of the occupants of the care facilities, traveller pitches will need to be located a sufficient distance away from this to ensure their well-being is maintained.
- 10.4 The size of the proposed allocation is considered to be large enough to achieve this; however, we would welcome revised wording in the policy to ensure that the amenity of existing uses/occupants of West Hall is not adversely affected. Again, the requirement for any master planning exercise to involve our client would provide confidence that this would be achieved.